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September 25, 2020

The Honorable Leda Wettre
United States District Court for the District of New Jersey
50 Walnut Street
Newark, NJ 07102

RE :POLYNICE v. NEW JERSEY DEP'T OF CORRECTIONS

Docket No. 2:19-cv-16875-MCA-LDW

Dear Judge Wettre:

I represent Plaintiff in this matter. Pending before the court is Plaintiff's Motion to Amend the Complaint. The proposed amendments pertain both to the original Department of Corrections Defendants as well as to a new proposed Defendant, UCHC, the medical contractor of the New Jersey Department of Corrections.

The Department of Corrections Defendants did not oppose the motion, however, UCHC did.

As I sat down to compose the reply to UCHC's opposition this afternoon, I perceived an opportunity to potentially resolve the dispute with UCHC out of court. I sent UCHC's attorney, Mr. Pyle, a proposal but have not yet heard back yet. If he accepts, I would not withdraw the Motion, but I would submit a revised proposed Amended Complaint, one that only pertains to the undisputed portions relevant to the Department of Corrections Defendants.

I am therefore requesting a one-cycle adjournment of the motion. Thank you for your consideration in this matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "M. Poreda", written in a cursive style.

MICHAEL POREDA